



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to consider policy and implementation refinements to the Energy Storage Procurement Framework and Design Program (D.13-10-040, D.14-10-045) and related Action Plan of the California Energy Storage Roadmap.

Rulemaking 15-03-011  
(Filed March 26, 2015)

**OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY**  
**(U 338-E) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING**  
**COMMENT ON WHETHER A NEW GENERAL ORDER IS NEEDED TO ESTABLISH**  
**A PRELIMINARY COMMISSION INSPECTION CHECKLIST FOR ENERGY**  
**STORAGE FACILITIES**

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**I.**

**INTRODUCTION**

Pursuant to the Ruling issued by Administrative Law Judge Cooke on September 30, 2016 (ALJ Ruling), Southern California Edison Company (SCE) respectfully provides its comments on whether a new General Order (GO) is needed to establish a preliminary Commission Inspection Checklist for energy storage facilities. SCE appreciates the opportunity to provide comments on the ALJ Ruling, and recommends against establishing a new GO to implement the energy storage system checklist at this time.

## II.

### **A NEW GENERAL ORDER IS NOT NEEDED TO IMPLEMENT THE ENERGY STORAGE SYSTEM CHECKLIST**

As directed in Decision (D.) 16-01-032, SCE participated in the energy storage Working Group with the other Investor Owned Utilities (IOUs), energy storage developers, and interested parties convened by the Commission's Safety and Enforcement Division (SED). The purpose of this Working Group was to leverage the IOUs' standards development work and experience with energy storage systems to develop a preliminary checklist for SED inspectors to use for energy storage systems. The checklist developed by the Working Group is attached to the ALJ Ruling.

The ALJ Ruling states, "[b]ecause the checklist guides Commission staff activities and does not establish a new utility obligation, it does not appear that any amendment to current General Orders or creation of a new General Order is required at this time."<sup>1</sup> SCE concurs with this assessment. The checklist appropriately guides staff activity with respect to inspecting energy storage devices at utility-owned sites.<sup>2</sup> The checklist applies to Commission Staff and, as stated in the Ruling, does not create a new obligation for utilities. Therefore, it is appropriate to conclude that it is unnecessary to amend current General Orders or create a new General Order. Moreover, placing the safety checklist into a new or amended General Order would make updating that checklist a formal and more lengthy and arduous task. Because energy storage facilities utilize new and emerging technology, it is reasonable for the safety inspection checklist to remain an informal document that can be easily updated to reflect new information and best practices.<sup>3</sup>

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<sup>1</sup> ALJ Ruling at 1.

<sup>2</sup> ALJ Ruling, Attachment A, at 1 (noting that D. 16-01-032 "directs the Commission's Safety and Enforcement division to develop guidelines for its own inspectors to use when looking at energy storage devices at utility-owned sites.") SCE's understanding is that the checklist is limited to energy storage at utility-owned sites and substation assets.

<sup>3</sup> The inspection checklist notes that it will need to evolve over time, and that "[e]xisting inspection items may be changed in response to lessons learned and emerging best practices acquired by SED inspectors and their advisors"). See ALJ Ruling, Attachment A, at 3.

If the checklist expands in its scope in the future to encompass energy storage systems that are not within the Commission's jurisdiction (such as third party owned and operated energy storage systems with which the utility contracts for generation services), revisions to applicable laws and/or General Orders may be necessary. In that event, SCE recommends the Commission provide parties the opportunity to provide further comments.

### III.

#### **CONCLUSION**

SCE appreciates the opportunity to provide these comments, and looks forward to continuing participation on the Safety Working Group.

Respectfully submitted,

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